

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WISCONSIN

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SHANNON GOLAT,

Plaintiff,  
v.

WISCONSIN STATE COURT SYSTEM, *et al.*,

ORDER

23-cv-719-jdp

Defendants.

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The court held a hearing on the parties' pending discovery motions on October 17, 2024. Dkts. 38 & 44. Plaintiff was represented by Attorneys Adam Almen and Neven Selimovic. Defendants were represented by Assistant Attorneys General Katherine Polich and Tiffany Winter. For the reasons stated on the record, the court GRANTED defendants' motion for a standing protective order, Dkt. 44, with modifications as discussed on the record. The parties must submit a joint proposed protective order, Dkt. 46, that incorporates the court's feedback by COB on October 22, 2024. With a protective order soon to be in place, plaintiff's motion to compel, Dkt. 38, is GRANTED, and defendants must produce their entire responses to the requests at-issue by COB on October 25, 2024.

Defendants' motion to quash the deposition of Assistant Attorney General Jeff Simcox noticed for October 25, 2024, Dkt. 44, is DENIED without prejudice because the privilege objections are not sufficiently particularized. Plaintiff needs to set forth more specific lines of questioning so defendants may better evaluate and object to the questions. To facilitate this, the court set the following schedule: plaintiff must provide defendants a list of topics, questions, and documents that plaintiff intends to use at the deposition by October 29, 2024. The parties must then meet and confer about the deposition by November 12, 2024. If any

dispute remains, the parties will submit a joint motion that describes those lingering issues and the parties' respective positions by November 26, 2024. The positions should address the authorities and reasoning set forth in *Loendorf v. PeopleConnect, Inc.*, 2022 WL 2867174 (N.D. Ill. July 21, 2022). Meanwhile, the noticed deposition is STAYED. The parties bear their own costs on these motions.

Entered this 17<sup>th</sup> day of October, 2024.

BY THE COURT:

/s/

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ANITA MARIE BOOR  
Magistrate Judge